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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 25-00053 WHO
)	
Plaintiff,)	
)	
v.)	STIPULATION RE INTERIM DISBURSEMENT
)	OF FUNDS IN CLERK'S ACCOUNT AND
NOAH ROSKIN-FRAZEE,)	[PROPOSED] ORDER
)	
Defendant.)	
)	

The United States and defendant Noah Roskin-Frazee, by and through their respective counsel, hereby stipulate and agree as follows:

- Pursuant to the plea agreement in the above-captioned matter and in the related case, No. 23-CR-00471 WHO, defendant Noah Roskin-Frazee agreed to deposit at least \$1 million in the registry of the Court within 60 days of the entry of his guilty pleas and at least another \$100,000 in the registry of the Court within 18 months of his guilty pleas. *See* Plea Agmt. ¶ 9. This money was to be deposited for the benefit of the defendant's restitution obligations. *Id.*

2. The defendant has since deposited a total of \$1,128,925.86 into the registry of the Court. *See* ECF Nos. 13, 19.
3. The Court has not yet made a final determination of the total restitution owed by the defendant, but the parties have agreed that it totals at least \$3,945,096.32. *See* Plea Agmt. ¶ 9.
4. The defendant is enrolled in one of the Court’s alternative justice programs; if the defendant successfully completes that program, the Court will likely not impose judgment for more than a year.
5. In light of this extended delay in the proceedings, the parties have determined that it is appropriate for the Clerk to make an interim distribution of the funds in the Clerk’s registry to the victims and have agreed that the defendant should receive credit in this amount towards any restitution the Court eventually orders.
6. On October 17, 2024, prior to the guilty plea and sentencing in this case, the Court directed the Clerk to accept payment for the defendant’s criminal monetary penalties and “maintain such funds in the Clerk’s Registry, including interest earned thereon, pending any further order of the Court.” ECF No. 27.

WHEREFORE, for the foregoing reasons, the parties respectfully request that the Court enter an order in the form proposed directing the Clerk to disburse the funds it maintains under the above-captioned case including interest earned thereon, with three percent going to the victim identified in the Indictment as COMPANY A and 97 percent going to the victim identified in the Indictment as COMPANY B.

IT IS SO STIPULATED this 18th day of June, 2025.

CRAIG H. MISSAKIAN
United States Attorney

/s/ Nikhil Bhagat

NIKHIL BHAGAT
Assistant U.S. Attorney

CONRAD METLITZKY KANE LLP

/s/ Miranda Kane

MIRANDA KANE
Counsel for Noah Roskin-Frazee

[PROPOSED] ORDER

Pursuant to the parties' stipulation, and for good cause shown,

IT IS HEREBY ORDERED that the Clerk of Court disburse approximately **97 percent** of the funds in the Clerk's registry that are designated under the case number 3:25-CR-00053 WHO to the victim identified as COMPANY B in the Indictment in case number 3:23-CR-00471;

IT IS FURTHER ORDERED that the Clerk of Court disburse approximately **three percent** of the funds in the Clerk's registry that are designated under the case number 3:25-CR-00053 WHO to the victim identified as COMPANY A in the Indictment in case number 3:23-CR-00471.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

HON. WILLIAM H. ORRICK
Senior United States District Judge